

United States District Court
Northern District of California

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

RENÉ QUIÑONEZ and
MOVEMENT INK LLC,

Plaintiffs,

v.

UNITED STATES OF AMERICA,

Defendant.

Case No. 3:22-cv-03195-WHO

**STIPULATED REQUEST FOR
TEN-DAY EXTENSION OF DEADLINE
FOR PLAINTIFFS' OBJECTIONS TO
DEFENDANT'S BILL OF COSTS
(Doc. 164)**

Judge: Hon. William H. Orrick

1 Pursuant to Local Rule 6-2, Plaintiffs and Defendant United States respectfully stipulate to
2 and request a ten-day extension of Plaintiffs' deadline for objections to Defendant's bill of costs
3 (Doc. 164).

4 Defendant filed its bill of costs on April 25. Plaintiffs' objections are due within 14 days of
5 that date, on May 9. Local Rule 54-2(a).

6 Due to Plaintiffs' professional and personal obligations, as well as Plaintiffs' counsel's
7 simultaneous professional and personal obligations (including class action depositions, a petition
8 for rehearing en banc, and summary judgment briefing in three different federal lawsuits), Plaintiffs'
9 counsel asked Defendant's counsel for consent to a ten-day extension by email on May 7.
10 Defendant's counsel consented the same day.

11 This extension is not sought in bad faith or for purposes of delay. And no other extension
12 has been sought or is expected on this issue.

13 This extension will not impact any other deadlines in this case.

14 For these reasons, the parties respectfully request that the Court extend Plaintiffs' deadline
15 for objections to Defendant's bill of costs by ten days, from May 9 to May 19, 2025.

16 A proposed order is appended hereto, and a declaration of Plaintiffs' counsel accompanies
17 this stipulation.

Dated: May 7, 2025

s/ Jaba Tsitsuashvili

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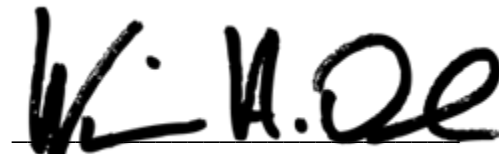
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Counsel for Plaintiffs

**THE PARTIES' STIPULATION ABOVE IS GRANTED. PLAINTIFFS' DEADLINE FOR
OBJECTIONS TO DEFENDANT'S BILL OF COSTS IS EXTENDED BY TEN DAYS,
FROM MAY 9 TO MAY 19, 2025.**

Dated: May 8, 2025



Hon. William H. Orrick

United States District Court Judge